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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

GBG USA, INC., *et al.*,¹

Debtors.

PETER HURWITZ, AS LITIGATION TRUSTEE
OF THE GBG USA LITIGATION TRUST,

Plaintiff,

v.

Richard Nixon Darling, Mark Joseph Caldwell,
Ronald Ventricelli, Robert K. Smits, Stephen Harry
Long, Brandon Carrey, Fung Holdings (1937)
Limited, Fung Distribution International Limited,
Step Dragon Enterprise Ltd., Golden Step Limited,
William Fung Kwon Lun, King Lun Holdings
Limited, First Island Developments Limited, Victor
Fung Kwok King, Spencer Theodore Fung, HSBC
Trustee (C.I.) Limited, Bruce Philip Rockowitz, and
Hurricane Millennium Holdings Limited,

Defendants.

Chapter 11

Case No. 21-11369 (MEW)

(Joint Administration Requested)

Adversary Proceeding

Adv. Proc. Case No. 23-01022 (MEW)

¹ The “Debtors” in these chapter 11 cases and the last four digits of each Debtor’s federal taxpayer identification number are as follows: GBG USA Inc. (2467), Jimlar Corporation (8380), GBG North America Holdings Co., Inc. (5576), Homestead International Group Ltd. (0549), IDS USA Inc. (7194), MESH LLC (8424), Frye Retail, LLC (1352), Krasnow Enterprises, Inc. (0122), Krasnow Enterprises Ltd. (0001), Pacific Alliance USA, Inc. (0435), GBG Spyder USA LLC (9108), and GBG Sean John LLC (1287). The Debtors’ mailing address was GBG USA Inc., P.O. Box 4965, Greensboro, NC 27404.

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned hereby appears in the above-referenced adversary proceeding on behalf of Richard Nixon Darling, Mark Joseph Caldwell, Ronald Ventricelli, Robert K. Smits and Brandon Carrey (the “Select Defendants”) and, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), hereby requests that copies of all notices and pleadings given or required to be given in this case, and all papers served or required to be served in this case, be delivered and served upon the undersigned attorneys at the following address, telephone and email addresses, and further requests to be added to the master service list established in this case:

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PLEASE TAKE FURTHER NOTICE that that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only notices and papers referred to in the above-referenced Bankruptcy Rules and the Bankruptcy Code, but also includes, without limitation, all other notices, papers, reports, orders, agenda letters, applications, motions, petitions, pleadings, requests, complaints or demands, statements of affairs, operating reports, schedules of assets and liabilities whether formal or informal, whether written or oral, and whether transmitted or conveyed by the United States overnight or electronic mail, facsimile, courier, telephone, otherwise in these cases.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Notices and Papers (the “Notice”), nor any later appearance, pleading, proof of claim, claim or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding related to, or triable in, these cases or any case, controversy or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other rights, claims, actions,

defenses, setoffs or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: August 1, 2023

Respectfully submitted,

KATTEN MUCHIN ROSENMAN LLP

/s/ Julia M. Winters

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